STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

Geneva Wood Fuels, LLC
Franklin County
Strong, Maine
A-342-71-Q-A (SM)

Departmental
Findings of Fact and Order
Air Emission License
Amendment #3

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Geneva Wood Fuels, LLC (Geneva Wood Fuels) has submitted an amendment application for its wood pellet manufacturing facility in Strong, Maine. The proposed amendment includes the following:

- an increase in the allowable boiler fuel use from 15,754 to 28,000 tons of wood per year,
- the addition of a daily boiler fuel limit of 78 tons of wood per day,
- language for the maintenance of the boiler multiclone and operation within an appropriate O_2 boiler load curve.
- an increase in the dryer process rate from 56,724 to 64,500 lb/hr, and
- an ambient air quality modeling analysis.

B. Emission Equipment

This air emission license amendment addresses the currently licensed equipment:

Fuel Burning Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (lb/hr)	Fuel Type	Pollution Control Equipment	Stack #
Boiler 1	33.7	9361 (3600 Btu/lb wet wood/bark)	wood	multiclone	1
Wood Burner on Dryer 1	40	4665 (10% moisture)	wood	multiclone	2

Note: There will be no changes to the maximum capacity of the equipment, only a change in the annual fuel limit and an added daily limit.

Process Equipment

Equipment	Max. Raw Material Process Rate	Max. Finished Material Process Rate
Dryer 1	*Existing*: 56,724 lb/hr green wood 45% moisture	*Existing*: 34,665 lb/hr Dry wood 10% moisture
	Proposed: 64,500 lb/hr green wood 43% moisture	*Proposed*: 40,850 lb/hr Dry wood 10% moisture

C. Application Classification

The modification of a minor source is considered a major modification based on whether or not expected emission increases exceed the "Significant Emission Levels" as defined in the *Definitions Regulation*, 06-096 CMR 100 (last amended December 24, 2005). The emission increases are determined by subtracting the current licensed emissions preceding the modification from the maximum future licensed allowed emissions, as follows:

Pollutant	Current License (TPY)	Future License (TPY)	Net Change (TPY)	Significance Level (TPY)
PM	56.0	76.1	+20.1	100
PM_{10}	24.5	30.1	+5.6	100
SO_2	9.4	11.1	+1.7	100
NO_x	38.5	55.5	+17.0	100
CO	75.5	119.6	+44.1	100
VOC	47.3	57.8	+10.5	50

This modification is determined to be a minor modification and the application has been processed under 06-096 CMR 115. However, this modification results in facility emissions over the major source thresholds for CO and VOC. Geneva Wood Fuels shall apply for a Part 70 license under *Part 70 Air Emission License Regulation,* 06-096 CMR 140, Section 1(J)(2)(D) (last amended December 24, 2005), within 12 months of commencing operation, as provided in 40 CFR Part 70.5.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in 06-096 CMR 100. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 CMR 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Boiler Fuel Use

Boiler #1 was manufactured in 1980 with a maximum capacity of 33.7 MMBtu/hr firing wood waste. Geneva Wood Fuels has proposed to increase the annual boiler fuel use from 15,754 tons wood/yr to 28,000 tons wood/yr, based on 3600 Btu/lb (or equivalent), on a 12 month rolling total, to allow the facility to generate the necessary electricity for operating the pellet manufacturing equipment.

Geneva Wood Fuels submitted a BACT analysis as part of this application. The BACT included a search of EPA's RACT/BACT/LAER Clearinghouse and recently permitted wood-fired boilers less than 100 MMBtu/hr. Controls deemed technically infeasible for this unit were: fabric filters (fire safety), selective catalytic reduction (high particulate loading), and oxidation catalyst (plugging/fouling). Controls deemed economically infeasible for this unit were: electrostatic precipitators, wet scrubbers, electrified gravel bed filters, selective non-catalytic reduction, dry reagent injection, and spray dryer technology.

For the size, age, and level of emissions from the boiler, BACT was identified as a multicyclone, an oxygen monitor to monitor boiler combustion efficiency, a stack economizer to increase boiler efficiency, the firing of clean wood fuel, and good combustion practices.

The BACT emissions are summarized below:

PM: 0.3 lb/MMBtu; 10.1 lb/hr

PM_{10}: 7.02 lb/hr, based on modeling results to meet the 24 hour ambient air quality standard

SO_2: 0.04 lb/MMBtu; 1.35 lb/hr

NO_X: 0.3 lb/MMBtu; 10.1 lb/hr

CO: 1.0 lb/MMBtu; 33.7 lb/hr

VOC: 0.06 lb/MMBtu; 2.02 lb/hr

Opacity: Visible emissions from Boiler #1 shall not exceed 30% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous 3-hour period.

Geneva Wood Fuels shall be limited to 78 ton wood/day limit. This is in place to meet the 24 hour ambient air quality standard. Calculation:

(7.02 lb PM_{10}/hr)/ ((0.30 lb PM_{10}/MMBtu)* (0.003600 MMBtu/lb wood))*(24 hr/day)*(tons wood/2000 lb wood) = 78 tons wood/day

Geneva Wood Fuels shall maintain a log detailing all routine and non-routine maintenance on the boiler multiclone. The log shall include the date and nature of all multiclone failures.

Geneva Wood Fuels shall establish an O_2/boiler load curve and shall operate the boiler within the curve to meet good air pollution control practices.

Compliance with the 78 tons/day and 28,000 tons/year fuel use limits shall be documented by daily records in a fuel use log, based on bucket loads of fuel.

C. Dryer Production

Dryer #1 is a rotary dryer and burner system. The wood-fired burner is rated at 40 MMBtu/hr. Geneva Wood Fuels has proposed to increase the throughput of the dryer from 56,724 to 64,500 lb/hr (32.3 tons/hr) green wood at approximately 43% moisture content, equivalent of increasing from 15.6 oven-dried tons (ODT) of wood an hour to 18.4 ODT/hr at 0% moisture.

A BACT analysis was recently submitted in May 2008, and the determination for dryer control and operations have not changed in the six months since the dryer was licensed. The dryer will continue to be subject to the operating limit of 7500 hours per year, temperature requirements, and the use of process cyclones.

BACT emissions resulting from the new production rate are the following:

PM: 12.25 lb/hr
PM_{10}: 2.42 lb/hr
SO_2: 0.047 lb/MMBtu; 1.88 lb/hr
NO_X: 0.367 lb/ODT; 6.75 lb/hr
CO: 5 lb/hr
VOC: 0.75 lb/ODT; 13.80 lb/hr
Opacity: Visible emissions from the dryer stack shall not exceed 20% opacity on a 6-minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period.

Geneva Wood Fuels shall perform stack testing on Dryer #1 as required in air emission license amendment A-342-71-P-T/A (test for PM, PM_{10}, CO, and VOC within 6 months of start-up).

D. Annual Emissions

Geneva Wood Fuels shall be limited to the following annual emissions, based on a 12 month rolling total, and calculated from an annual boiler fuel limit of 28,000 tons/year wood waste (55% moisture or equivalent) and an annual operating limit on the dryer of 7500 hours/year at the production rate of 64,500 lb/hr green wood:

Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM_{10}	SO_2	NO_x	CO	VOC
Boiler	30.2	21.0	4.0	30.2	100.8	6.0
Dryer	45.9	9.1	7.1	25.3	18.8	51.8
Total TPY	**76.1**	**30.1**	**11.1**	**55.5**	**119.6**	**57.8**

III. AMBIENT AIR QUALITY ANALYSIS

A. Overview

A refined modeling analysis was performed to show that emissions from Geneva Wood Fuels, in conjunction with other sources, will not cause or contribute to violations of Maine Ambient Air Quality Standards (MAAQS) for SO_2, PM_{10}, NO_2 or CO or to Class II increments for SO_2, PM_{10} or NO_2.

Since the current licensing action for Geneva Wood Fuels represents a minor modification to an existing minor source, it has been determined by MEDEP-

BAQ that an assessment of Class I Air Quality Related Values (AQRVs) is not required.

B. Model Inputs

The AERMOD-PRIME refined model was used to address standards and increments in all areas. The modeling analysis accounted for the potential of building wake and cavity effects on emissions from all modeled stacks that are below their calculated formula GEP stack heights.

All modeling was performed in accordance with all applicable requirements of the Maine Department of Environmental Protection, Bureau of Air Quality (MEDEP-BAQ) and the United States Environmental Protection Agency (USEPA).

A valid 5-year hourly off-site meteorological database was used in the AERMOD-PRIME refined modeling analysis. Five years of wind data was collected at heights of 10 and 70 meters at the Madison Paper Industries meteorological monitoring site from 1991-1995. Surface data collected at the Augusta State Airport FAA site were substituted for missing surface data. All other missing data were interpolated or coded as missing, per USEPA guidance.

The surface meteorological data was combined with concurrent hourly cloud cover and upper-air data obtained from the Caribou National Weather Service (NWS). Missing cloud cover and/or upper-air data values were interpolated or coded as missing, per USEPA guidance.

All necessary representative micrometeorological surface variables for inclusion into AERMET (surface roughness, Bowen ratio and albedo) were calculated using AERSURFACE from procedures recommended by USEPA (2008).

Point-source parameters, used in the modeling for Geneva Wood Fuels are listed in Table III-1.

TABLE III-1: Point Source Stack Parameters

Facility/Stack	Stack Base Elevation (m)	Stack Height (m)	GEP Stack Height (m)	Stack Diameter (m)	UTM Easting NAD27 (km)	UTM Northing NAD27 (km)
CURRENT/PROPOSED						
Geneva Wood Fuels						
• Boiler Stack	161.54	27.43	30.48	1.37	403.621	4961.937
• Dryer Stack	161.54	15.24	30.48	1.12	403.619	4961.897
1987 BASELINE						
Geneva Wood Fuels						
• Geneva Wood Fuels conservatively assumed no credit for sources existing in the 1987 baseline year.						

1977 BASELINE						
Geneva Wood Fuels						
• Boiler Stack	161.54	27.43	30.48	1.37	403.621	4961.937

Emission parameters for Geneva Wood Fuels for MAAQS and increment modeling are listed in Table III-2. The emission parameters for Geneva Wood Fuels are based on the maximum license allowed (worst-case) operating configuration. For the purposes of determining NO_2 impacts, all NO_X emissions were conservatively assumed to convert to NO_2, respectively.

TABLE III-2: Stack Emission Parameters

Facility/Stack	Averaging Periods	SO_2 (g/s)	PM_{10} (g/s)	NO_2 (g/s)	CO (g/s)	Stack Temp (K)	Stack Velocity (m/s)
MAXIMUM LICENSE ALLOWED							
Geneva Wood Fuels – Scenario 1							
• Boiler Stack (100%)	All	0.18	0.88	1.27	4.25	455.37	4.13
• Dryer Stack (100%)	All	0.24	0.30	0.85	0.63	363.71	28.81
Geneva Wood Fuels – Scenario 2							
• Boiler Stack (100%)	All	0.18	0.88	1.27	4.25	455.37	4.13
• Dryer Stack (67%)	All	0.16	0.20	0.57	0.42	363.71	19.30
Geneva Wood Fuels – Scenario 3							
• Boiler Stack (60%)	All	0.11	0.53	0.76	2.55	455.37	2.48
• Dryer Stack (100%)	All	0.24	0.30	0.85	0.63	363.71	28.81
Geneva Wood Fuels – Scenario 4							
• Boiler Stack (60%)	All	0.11	0.53	0.76	2.55	455.37	2.48
• Dryer Stack (67%)	All	0.16	0.20	0.57	0.42	363.71	19.30
BASELINE – 1987							
Geneva Wood Fuels							
• Geneva Wood Fuels conservatively assumed no credit for sources existing in the 1987 baseline year.							
BASELINE – 1977							
Geneva Wood Fuels							
• Boiler Stack	All	0.14	1.06			455.37	3.43

C. Single Source Modeling Impacts

Refined modeling was performed for a total of nine operating scenarios that represented a range of maximum, typical and minimum operations.

The AERMOD-PRIME model results for Geneva Wood Fuels alone are shown in Table III-3. Maximum predicted impacts that exceed their respective significance level are indicated in boldface type. No further modeling was required for pollutant/terrain combinations that did not exceed their respective significance levels.

TABLE III-3: Maximum AERMOD-PRIME impacts from Geneva Wood Fuels Alone

Pollutant	Averaging Period	Max Impact ($\mu g/m^3$)	Receptor UTM E (km)	Receptor UTM N (km)	Receptor Elevation (m)	Max Impact Scenario	Class II Significance Level ($\mu g/m^3$)
SO_2	3-hour	**51.29**	403.629	4961.847	161.57	**1**	**25**
	24-hour	**40.11**	403.619	4961.847	160.61	**1**	**5**
	Annual	**5.69**	403.629	4961.857	162.44	**2**	**1**
PM_{10}	24-hour	**102.88**	403.619	4961.847	160.61	**1**	**5**
	Annual	**12.15**	403.629	4961.857	162.44	**2**	**1**
NO_2	Annual	**24.91**	403.629	4961.857	162.44	**2**	**1**
CO	1-hour	816.64	403.649	4961.827	160.86	1	2000
	8-hour	478.85	403.629	4961.847	161.57	1	500

D. Combined Source Modeling Impacts

For predicted modeled impacts from Geneva Wood Fuels alone that exceeded significance levels, as indicated in boldface type in Table III-3, other sources not explicitly included in the modeling analysis must be accounted for by using representative background concentrations for the area.

Background concentrations, listed in Table III-4, are derived from representative rural background data for use in the Central Maine region.

TABLE III-4: Background Concentrations

Pollutant	Averaging Period	Background Concentration ($\mu g/m^3$)	Date
SO_2	3-hour	24	2003 [1]
	24-hour	13	
	Annual	5	
PM_{10}	24-hour	45	2002 – 2003 [2]
	Annual	14	
NO_2	Annual	11	1995 [3]

Notes:
[1] Robinson Site, Easton
[2] Jewell Property Site, Jay
[3] TLSP Site, Cape Elizabeth

MEDEP examined other nearby sources to determine if any impacts would be significant in or near Geneva Wood Fuels significant impact area. Due to the Geneva Wood Fuels location, extent of the predicted significant impact area and

other nearby source's emissions, MEDEP has determined that no other sources would be considered for combined source modeling.

For pollutant averaging periods that exceeded significance levels, the maximum modeled impacts from the model predicting the highest concentrations were added with conservative rural background concentrations to demonstrate compliance with MAAQS, as shown in Table III-5. Because all pollutant/averaging period impacts using this method meet MAAQS, no further MAAQS modeling analyses need to be performed.

TABLE III-5: Maximum Combined Sources Impacts

Pollutant	Averaging Period	Max Impact ($\mu g/m^3$)	Back-Ground ($\mu g/m^3$)	Max Total Impact ($\mu g/m^3$)	MAAQS ($\mu g/m^3$)
SO_2	3-hour	51.29	24.00	75.29	1150
	24-hour	40.11	13.00	53.11	230
	Annual	5.69	5.00	10.69	57
PM_{10}	24-hour	102.88	45.00	147.88	150
	Annual	12.15	14.00	26.15	40
NO_2	Annual	24.91	11.00	35.91	100

E. Increment

The AERMOD-PRIME refined model was used to predict maximum Class II increment impacts in all areas.

Results of the Class II increment analysis are shown in Tables III-6. All modeled maximum increment impacts were below all increment standards. Because all predicted increment impacts meet increment standards, no further Class II SO_2, PM_{10} and NO_2 increment modeling needed to be performed.

TABLE III-6: Class II Increment Consumption

Pollutant	Averaging Period	Max Impact ($\mu g/m^3$)	Receptor UTM E (km)	Receptor UTM N (km)	Receptor Elevation (m)	Max Impact Scenario	Class II Increment ($\mu g/m^3$)
SO_2	3-hour	49.89	403.609	4961.957	162.95	3	512
	24-hour	31.27	403.629	4961.847	161.57	1	91
	Annual	4.49	403.629	4961.857	162.44	2	20
PM_{10}	24-hour	25.07	403.629	4961.857	162.44	1	30
	Annual	2.86	403.609	4961.957	162.95	4	17
NO_2	Annual	15.57	403.629	4961.857	162.44	2	25

Federal regulations and 06-096 CMR 140 require that any major new source or major source undergoing a major modification provide additional analyses of impacts that would occur as a direct result of the general, commercial, residential, industrial and mobile-source growth associated with the construction and operation of that source. Since this licensing action represents a minor modification to an existing minor source, no additional analyses were required.

F. Class I Impacts

Since the current licensing action for Geneva Wood Fuels represents a minor modification to an existing minor source, it has been determined by MEDEP-BAQ that an assessment of Class I Air Quality Related Values (AQRVs) is not required.

G. Summary

In summary, it has been demonstrated that Geneva Wood Fuels in its proposed configuration will not cause or contribute to a violation of any SO_2, PM_{10}, NO_2 or CO averaging period MAAQS or any SO_2, PM_{10} or NO_2 averaging period Class II increment standards.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License Amendment A-342-71-Q-A subject to the conditions in Air Emission License A-342-71-M-N, amendments A-342-71-N-M and A-342-71-P-T/A, and in the following conditions.

SPECIFIC CONDITIONS

The following shall replace condition (16) in air emission license A-342-71-M-N, as amended in air emission license amendment #2, A-342-71-P-T/A:

(16) **Boiler #1 (33.7 MMBtu/hr – wood fired)**

A. Emissions from Boiler #1 shall not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority
PM	0.3	06-096 CMR 103(2)(B)(4)(a)
NO_X	0.3	06-096 CMR 115, BACT

B. Emissions from Boiler #1 shall not exceed the following [06-096 CMR 115, BACT]:

PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
10.1	7.02*	1.4	10.1	33.7	2.0

* PM_{10} hourly limit based on the daily fuel use limit of 78 tons/day.

C. Visible emissions from Boiler #1 shall not exceed 30% opacity on a six (6) minute block average, except for no more than two (2) six (6) minute block averages in a continuous 3-hour period. [06-096 CMR 101]

D. Boiler Fuel Use

1. Daily fuel use shall not exceed 78 tons/day wood waste (3600 Btu/lb, 55% moisture), or equivalent. [06-096 CMR 115, Ambient Air Quality Modeling Requirement for PM_{10}]
2. Fuel use in the boiler shall not exceed 28,000 tons/yr wood waste (3600 Btu/lb, 55% moisture), or equivalent, on a 12 month rolling total. [06-096 CMR 115, BACT]
3. Compliance with the daily and annual boiler fuel use limits shall be documented by daily recordkeeping in a fuel use log, based on bucket loads of fuel. The log shall include the estimation of the amount of fuel in

a bucket load. Fuel use records shall be maintained on a daily, monthly, and 12 month rolling total. [06-096 CMR 115, BACT]

E. Geneva Wood Fuels may mix specification waste oil with the wood waste residue fired in the wood fired boiler. The specification waste oil use shall not exceed 60 gallons/month. Records shall be maintained documenting the gallons of specification waste oil fired each month.

Geneva Wood Fuels may mix oily rags with the wood waste residue fired in the wood fired boiler. The oily rags must originate from the facility and the permeated oil must meet the requirements of specification waste oil. Geneva Wood Fuels shall maintain records of the amount of oily rags burned each month (ie – a full 55 gallon drum, ½ drum, etc).

An analysis of a representative waste oil sample shall be kept on site. If there are changes in the process or if there are changes in the maintenance garage that may effect the composition of the waste oil collected, a new representative sample shall be tested. These test results shall be kept on-site and a copy shall be submitted to the Bureau of Air Quality. [06-096 CMR 115, BACT and 06-096 CMR 860]

F. Geneva Wood Fuels shall maintain a log detailing all routine and non-routine maintenance on the boiler multiclone. The log shall include the date and nature of all multiclone failures. [06-096 CMR 115, BACT]

G. Geneva Wood Fuels shall establish an O_2/boiler load curve and shall operate within the curve to maximize boiler efficiency and minimize air emissions. [06-096 CMR 115, BACT]

The following shall replace condition (17) in air emission license A-342-71-M-N, as amended in amendment #1, A-342-71-N-M, and amendment #2, A-342-71-P-T/A:

(17) **Dryer #1**

A. Emissions from the Dryer Process (including the 40 MMBtu/hr wood dryer burner) shall not exceed the following: [06-096 CMR 115, BACT]

PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_X (lb/hr)	CO (lb/hr)	VOC (lb/hr)
12.25	2.42	1.88	6.75	5.0	13.8

B. Visible emissions from the dryer stack shall not exceed 20% opacity on a 6-minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]

C. The inlet temperature of the rotary dryer shall be monitored on a continuous basis for a minimum of 95% of the time the rotary dryer is operating, except during periods of startup, shutdown, or malfunction. The inlet temperature of the rotary dryer shall be recorded at least once per shift. The date and time of each temperature reading shall also be recorded. The temperature monitoring system shall be installed, operated, maintained, and calibrated in accordance with the manufacturer's recommendations. [06-096 CMR 115, BACT]

D. Geneva Wood Fuels shall limit the dryer use to 7500 hours/year. An hour meter shall be installed and operated on the dryer and records shall be maintained daily, monthly, and on a 12 month rolling total. [06-096 CMR 115, BACT]

E. Geneva Wood Fuels shall maintain wood fuel records for the dryer burner on a daily, monthly, and 12 month rolling total. [06-096 CMR 115, BACT]

F. Geneva Wood Fuels shall keep records on the amount of product output on a monthly basis. [06-096 CMR 115, BACT]

G. Geneva Wood Fuels shall maintain a log detailing all routine and non-routine maintenance on the multiclone system. The log shall include the date and nature of all multiclone system failures. [06-096 CMR 115, BACT]

H. Geneva Wood Fuels shall record each startup, shutdown, and malfunction event of the dryer and multiclone including start time, end time, duration, cause, and method utilized to minimize the duration of the event and/or to prevent a reoccurrence. [06-096 CMR 115]

I. Within six months of start-up, Geneva Wood Fuels shall perform PM, PM_{10}, CO, and VOC stack tests on Dryer #1 in accordance with the appropriate EPA test methods. [06-096 CMR 115, BACT]

Condition (18) in air emission license A-342-71-M-N, as amended in amendment #2, A-342-71-P-T/A, regarding stack test requirements shall be removed (has been incorporated in condition (17) above).

The following is a new condition:

(24) Geneva Wood Fuels shall apply for a Part 70 license within 12 months of commencing operation under the proposed scenario as provided in 40 CFR Part 70.5. [06-096 CMR 140]

DONE AND DATED IN AUGUSTA, MAINE THIS 13th DAY OF January , 2009

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brooks for
DAVID P. LITTELL, COMMISSIONER

The term of this license shall be concurrent with Air Emission License A-342-71-M-N.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: October 27, 2008
Date of application acceptance: October 29, 2008

Date filed with the Board of Environmental Protection: _____

This Order prepared by Kathleen E. Tarbuck, Bureau of Air Quality.